

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

**TRAXCELL TECHNOLOGIES, LLC., )  
Plaintiff, )**

**v. )**

**Civil Action No. 2:17-cv-00719-RWS-RSP**

**SPRINT COMMUNICATIONS )  
COMPANY, LP, SPRINT )  
CORPORATION, SPRINT SPECTRUM,) )  
LP AND SPRINT SOLUTIONS, INC. )  
Defendants. )**

**PLAINTIFF’S MOTION TO DISMISS THE ACTION AGAINST DEFENDANT SPRINT  
CORPORATION WITHOUT PREJUDICE**

Plaintiff Traxcell Technologies, LLC files this Motion to Dismiss the action against Defendant Sprint Corporation without prejudice, including all claims and counterclaims. Traxcell Technologies, LLC and Sprint Corporation have stipulated to dismissal of the action without prejudice as allowed by Rule 41 (a)(2) of the Federal Rules of Civil Procedure.

**CONCLUSION**

Plaintiff requests that the action against Defendant Sprint Corporation be dismissed without prejudice.

Respectfully submitted,

**Ramey & Schwaller, LLP**

By: /s/ William P. Ramey, III  
William P. Ramey, III  
Texas Bar No. 24027643  
5020 Montrose Blvd., Suite 750

Houston, Texas 77006  
(713) 426-3923 (telephone)  
(832) 900-4941 (fax)  
wramey@rameyfirm.com

**Hicks Thomas, LLP**

John B. Thomas (Co-Counsel)  
[jthomas@hicks-thomas.com](mailto:jthomas@hicks-thomas.com)  
Texas Bar No. 19856150  
700 Louisiana Street, Suite 2000  
Houston, Texas 77002  
Telephone: (713) 547-9100  
Facsimile: (713) 547-9150

**Attorneys for Traxcell Technologies, LLC**

**CERTIFICATE OF CONFERENCE**

I certify that counsel for Defendant agreed to the filing of this motion on January 11, 2018.

/s/ William P. Ramey, III

**CERTIFICATE OF SERVICE**

Pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5, I hereby certify that all counsel of record who have appeared in this case are being served on this day of January 11, 2018 with a copy of the foregoing via the Court's CM/ECF system.

/s/ William P. Ramey, III  
William P. Ramey, III